

Section C: Prevention Program

Implemented the Program 3 prevention requirements as provided in 40 CFR 68.65 - 68.87?
Comments:

☐S ☒M ☐U ☐N/A

Prevention Program- Safety information [68.65]

- | | |
|---|---|
| <p>1. Has the owner or operator compiled written process safety information, which includes information pertaining to the hazards of the regulated substances used or produced by the process, information pertaining to the technology of the process, and information pertaining to the equipment in the process, before conducting any process hazard analysis required by the rule? [68.65(a)]</p> <p>Does the process safety information contain the following for hazards of the substances: [68.65(b)]</p> <p><input checked="" type="checkbox"/> Material Safety Data Sheets (MSDS) that meet the requirements of the OSHA Hazard Communication Standard [29 CFR 1910.1200(g)]? [68.48(a)(1)]</p> <p><input checked="" type="checkbox"/> Toxicity information? [68.65(b)(1)]</p> <p><input checked="" type="checkbox"/> Permissible exposure limits? [68.65(b)(2)]</p> <p><input checked="" type="checkbox"/> Physical data? [68.65(b)(3)]</p> <p><input checked="" type="checkbox"/> Reactivity data? [68.65(b)(4)]</p> <p><input checked="" type="checkbox"/> Corrosivity data? [68.65(b)(5)]</p> <p><input checked="" type="checkbox"/> Thermal and chemical stability data? [68.65(b)(6)]</p> <p><input checked="" type="checkbox"/> Hazardous effects of inadvertent mixing of materials that could foreseeably occur? [68.65(b)(7)]</p> | <p><input checked="" type="checkbox"/>Y <input type="checkbox"/>N <input type="checkbox"/>N/A</p> |
| <p>2. Has the owner documented information pertaining to technology of the process?</p> <p><input checked="" type="checkbox"/> A block flow diagram or simplified process flow diagram? [68.65(c)(1)(i)]</p> <p><input checked="" type="checkbox"/> Process chemistry? [68.65(c)(1)(ii)]</p> <p><input checked="" type="checkbox"/> Maximum intended inventory? [68.65(c)(1)(iii)]</p> <p><input checked="" type="checkbox"/> Safe upper and lower limits for such items as temperatures, pressures, flows, or compositions? [68.65(c)(1)(iv)]</p> <p><input checked="" type="checkbox"/> An evaluation of the consequences of deviation? [68.65(c)(1)(iv)]</p> | <p><input checked="" type="checkbox"/>Y <input type="checkbox"/>N <input type="checkbox"/>N/A</p> |
| <p>3. Does the process safety information contain the following for the equipment in the process: [68.65(d)(1)]</p> <p><input checked="" type="checkbox"/> Materials of construction? 68.65(d)(1)(i)]</p> <p><input type="checkbox"/> Piping and instrumentation diagrams [68.65(d)(1)(ii)]</p> <p><input checked="" type="checkbox"/> Electrical classification? [68.65(d)(1)(iii)]</p> <p><input checked="" type="checkbox"/> Relief system design and design basis? [68.65(d)(1)(iv)]</p> <p><input checked="" type="checkbox"/> Ventilation system design? [68.65(d)(1)(v)]</p> <p><input checked="" type="checkbox"/> Design codes and standards employed? [68.65(d)(1)(vi)]</p> <p><input type="checkbox"/> Material and energy balances for processes built after June 21, 1999? [68.65(d)(1)(vii)]</p> <p><input checked="" type="checkbox"/> Safety systems? [68.65(d)(1)(viii)]</p> | <p><input type="checkbox"/>Y <input checked="" type="checkbox"/>N <input type="checkbox"/>N/A</p> |
| <p>4. Has the owner or operator documented that equipment complies with recognized and generally accepted good engineering practices? [68.65(d)(2)]</p> | <p><input checked="" type="checkbox"/>Y <input type="checkbox"/>N <input type="checkbox"/>N/A</p> |
| <p>5. Has the owner or operator determined and documented that existing equipment, designed and constructed in accordance with codes, standards, or practices that are no longer in general use, is designed, maintained, inspected, tested, and operating in a safe manner? [68.65(d)(3)]</p> | <p><input checked="" type="checkbox"/>Y <input type="checkbox"/>N <input type="checkbox"/>N/A</p> |

RMP Program Level 3 Process ChecklistFacility Name: **BP Cherry Point Refinery****Prevention Program- Operating procedures [68.69]**

14. Has the owner or operator developed and implemented written operating procedures that provide instructions or steps for conducting activities associated with each covered process consistent with the safety information? [68.69(a)] ☒Y ☐N ☐N/A

15 Do the procedures address the following: [68.69(a)] ☐Y ☒N ☐N/A

Steps for each operating phase: [68.69(a)(1)]

- ☒ Initial Startup? [68.69(a)(1)(i)]
- ☒ Normal operations? [68.69(a)(1)(ii)]
- ☒ Temporary operations? [68.69(a)(1)(iii)]
- ☐ Emergency shutdown including the conditions under which emergency shutdown is required, and the assignment of shutdown responsibility to qualified operators to ensure that emergency shutdown is executed in a safe and timely manner? [68.69(a)(1)(iv)]
- ☒ Emergency operations? [68.69(a)(1)(v)]
- ☒ Normal shutdown? [68.69(a)(1)(vi)]
- ☒ Startup following a turnaround, or after emergency shutdown? [68.69(a)(1)(vii)]

Operating limits: [68.69(a)(2)]

- ☒ Consequences of deviations [68.69(a)(2)(i)]
- ☒ Steps required to correct or avoid deviation? [68.69(a)(2)(ii)]

Safety and health considerations: [68.69(a)(3)]

- ☒ Properties of, and physical hazards presented by, the chemicals used in the process [68.69(a)(3)(i)]
- ☒ Precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment? [68.69(a)(3)(ii)]
- ☒ Control measures to be taken if physical contact or airborne exposure occurs? [68.69(a)(3)(iii)]
- ☒ Quality control for raw materials and control of hazardous chemical inventory levels? [68.69(a)(3)(iv)]
- ☒ Any special or unique hazards? [68.69(a)(3)(v)]
- ☒ Safety systems and their functions? [68.69(a)(4)]

16. Are operating procedures readily accessible to employees who are involved in a process? [68.69(b)] ☒Y ☐N ☐N/A

17. Has the owner or operator certified annually that the operating procedures are current and accurate and that procedures have been reviewed as often as necessary? [68.69(c)] ☒Y ☐N ☐N/A

18. Has the owner or operator developed and implemented safe work practices to provide for the control of hazards during specific operations, such as lockout/tagout? [68.69(d)] ☒Y ☐N ☐N/A

Prevention Program - Mechanical Integrity [68.73]

25. Has the owner or operator established and implemented written procedures to maintain the on-going integrity of the process equipment listed in 68.73(a)? [68.73(b)] ☐Y ☒N ☐N/A

26. Has the owner or operator trained each employee involved in maintaining the on-going integrity of process equipment? [68.73(c)] ☒Y ☐N ☐N/A

27. Performed inspections and tests on process equipment? [68.73(d)(1)] ☒Y ☐N ☐N/A

28. Followed recognized and generally accepted good engineering practices for inspections and testing procedures? [68.73(d)(2)] ☒Y ☐N ☐N/A

RMP Program Level 3 Process Checklist**Facility Name: BP Cherry Point Refinery**

29. Ensured the frequency of inspections and tests of process equipment is consistent with applicable manufacturers' recommendations, good engineering practices, and prior operating experience? [68.73(d)(3)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
30. Documented each inspection and test that had been performed on process equipment, which identifies the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test? [68.73(d)(4)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
31. Corrected deficiencies in equipment that were outside acceptable limits defined by the process safety information before further use or in a safe and timely manner when necessary means were taken to assure safe operation? [68.73(e)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
32. Assured that equipment as it was fabricated is suitable for the process application for which it will be used in the construction of new plants and equipment? [68.73(f)(1)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
33. Performed appropriate checks and inspections to assure that equipment was installed properly and consistent with design specifications and the manufacturer's instructions? [68.73(f)(2)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
34. Assured that maintenance materials, spare parts and equipment were suitable for the process application for which they would be used? [68.73(f)(3)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

Prevention Program - Management Of Change [68.75]

35. Has the owner or operator established and implemented written procedures to manage changes to process chemicals, technology, equipment, and procedures, and changes to stationary sources that affect a covered process? [68.75(a)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
36. Do procedures assure that the following considerations are addressed prior to any change: [68.75(b)] <input type="checkbox"/> The technical basis for the proposed change? [68.75(b)(1)] <input type="checkbox"/> Impact of change on safety and health? [68.75(b)(2)] <input type="checkbox"/> Modifications to operating procedures? [68.75(b)(3)] <input type="checkbox"/> Necessary time period for the change? [68.75(b)(4)] <input type="checkbox"/> Authorization requirements for the proposed change? [68.75(b)(5)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
37. Were employees, involved in operating a process and maintenance, and contract employees, whose job tasks would be affected by a change in the process, informed of, and trained in, the change prior to start-up of the process or affected parts of the process? [68.75(c)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
38. If a change resulted in a change in the process safety information, was such information updated accordingly? [68.75(d)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
39. If a change resulted in a change in the operating procedures or practices, had such procedures or practices been updated accordingly? [68.75(e)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

Prevention Program - Pre-startup Safety Review [68.77]

40. If the facility installed a new stationary source, or significantly modified an existing source, (as discussed at 68.77(a)) did it perform a pre-startup safety review prior to the introduction of a regulated substance to a process to confirm: [68.77(b)] <input type="checkbox"/> Construction and equipment was in accordance with design specifications? [68.77(b)(1)] <input type="checkbox"/> Safety, operating, maintenance, and emergency procedures were in place and were adequate? [68.77(b)(2)] <input type="checkbox"/> For new stationary sources, a process hazard analysis had been performed and recommendations had been resolved or implemented before startup? [68.77(b)(3)] <input type="checkbox"/> Modified stationary sources meet the requirements contained in management of change? [68.77(b)(3)] <input type="checkbox"/> Training of each employee involved in operating a process had been completed? [68.77(b)(4)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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